

OFFICE OF THE PLACER COUNTY COUNSEL
Gregory Warner (SBN 282490)
175 Fulweiler Avenue
Auburn, California 95603
Telephone: (530) 889-4044
Facsimile: (530) 889-4069
Email: gwarner@placer.ca.gov

Attorney for Defendants COUNTY OF PLACER, PLACER
COUNTY SHERIFF'S DEPARTMENT, WAYNE WOO
JEFF SWEARINGEN, and DAVID KEENAN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ENGELBRECHT, B

Plaintiff,

v.

COUNTY OF PLACER; PLACER COUNTY
SHERIFF'S DEPARTMENT; WAYNE WOO,
as an Individual and in his official capacity;
PLACER COUNTY SUPERIOR COURT
JUDGE SUZANNE GAZZANIGA; PLACER
COUNTY'S AUBURN JAIL CORRECTIONS
MANAGER CAPTAIN JEFF SWEARINGEN,
PLACER COUNTY PRE-TRIAL PROBATION
SUPERVISOR DAVID KEENAN and DOES 1
through 100, in their individual and official
capacities.

Defendants.

Case No. 2:23-cv-00286-JAM-CKD

**JOINT STIPULATION AND ORDER TO
EXTEND DEFENDANTS PLACER
COUNTY SHERIFF'S DEPARTMENT,
WAYNE WOO, JEFF SWEARINGEN,
AND DAVID KEENAN'S TIME TO
RESPOND TO THE COMPLAINT**

Judge: John A. Mendez
Courtroom: 6, 14th Floor

Pursuant to Eastern District Local Rule 144(a), the parties request that the Court approve the following stipulation to extend the time for Defendants Placer County Sheriff's Department, Wayne Woo, Jeff Swearingen, and David Keenan's (the "County Defendants") time to respond to the

///

1 complaint is extended by ten (10) days from April 7, 2023 to April 17, 2023. This stipulation and
2 request are based on the following:

3 1. The County Defendants' original time to respond to the Complaint was March 10,
4 2023.

5 2. In order to provide additional time for the parties to meet and confer over the County
6 Defendants' anticipated Motion to Dismiss, the parties stipulated to a 28-day extension of time for
7 the County Defendants to Respond to the Complaint. ECF 10. Based on ECF 10, the County
8 Defendants must file and serve their responsive pleadings by April 7, 2023.

9 3. Based on the meet and confer efforts of both parties, Plaintiff has agreed to file an
10 amended complaint. Plaintiff anticipates filing the amended complaint by April 10, 2023.

11 4. To ensure that County Defendant's do not waive any rights to challenge the current
12 Complaint or affirmative defenses, the parties have stipulated to extend County Defendants' time to
13 file a responsive pleading to the Complaint until April 17, 2023 to allow Plaintiff the necessary time
14 to file the amended complaint.

15
16 Dated: March 30, 2023

OFFICE OF THE PLACER COUNTY COUNSEL

17
18 By: /s/ Gregory Warner
19 Gregory Warner, Attorney for Defendants
20 COUNTY OF PLACER, DAVID KEENAN,
21 PLACER COUNTY SHERIFF'S DEPARTMENT,
JEFF SWEARINGEN, and WAYNE WOO

22 Dated: March 30, 2023

BONES LAW FIRM

23
24 By: /s/ Gordon G. Bones
25 Gordon G. Bones, Attorney for Plaintiff
26 B. ENGELBRECHT
27
28

OFFICE OF THE PLACER COUNTY COUNSEL
Gregory Warner (SBN 282490)
175 Fulweiler Avenue
Auburn, California 95603
Telephone: (530) 889-4044
Facsimile: (530) 889-4069
Email: gwarner@placer.ca.gov

Attorney for Defendants COUNTY OF PLACER, PLACER
COUNTY SHERIFF'S DEPARTMENT, WAYNE WOO
JEFF SWEARINGEN, and DAVID KEENAN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ENGELBRECHT, B

Plaintiff,

v.

COUNTY OF PLACER; PLACER COUNTY
SHERIFF'S DEPARTMENT; WAYNE WOO,
as an Individual and in his official capacity;
PLACER COUNTY SUPERIOR COURT
JUDGE SUZANNE GAZZANIGA; PLACER
COUNTY'S AUBURN JAIL CORRECTIONS
MANAGER CAPTAIN JEFF SWEARINGEN,
PLACER COUNTY PRE-TRIAL PROBATION
SUPERVISOR DAVID KEENAN and DOES 1
through 100, in their individual and official
capacities.

Defendants.

Case No. 2:23-cv-00286-JAM-CKD

**ORDER TO EXTEND DEFENDANT
PLACER COUNTY SHERIFF'S
DEPARTMENT, WAYNE WOO, JEFF
SWEARINGEN, AND DAVID KEENAN'S
TIME TO RESPOND TO THE
COMPLAINT**

Judge: John A. Mendez
Courtroom: 6, 14th Floor

Upon consideration of Plaintiff and the County Defendants' Stipulation and Proposed Order to Extend the Time for the County Defendants to Respond to the Complaint, and finding good cause therefor, the Court hereby **EXTENDS** the time the County Defendants' time to respond to the Complaint from April 7, 2023 to **April 17, 2023**.

IT IS SO ORDERED.

Dated: March 30, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE